

CGB-CC-1139

# CHARIS

## CHRISTIAN CENTER



Pastors Lawson & Barbara Perdue  
720 Elkton Drive  
Colorado Springs, Colorado 80907  
719-227-0380 chariscc@msn.com

July 29, 2011

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Received & Inspected

AUG - 4 2011

FCC Mail Room

Re: Petition for Undue Burden Exemption  
from Closed Captioning Rules

Dear Ms. Dortch:

This letter is submitted pursuant to 47 C.F.R. §79.1(f) and requests an exemption on behalf of Charis Ministries (aka: Charis Christian Center) from the FCC's closed captioning rules based on undue burden. In accordance with 47 C.F.R. §79.1(f)(4), the original and two copies of this letter and all support are being provided.

Charis Ministries is a donor supported non-profit organization under the laws of the state of Colorado. Since 2008, we have produced a weekly thirty-minute video program called Grace For Today. Grace For Today is a program that presents the message of God's unconditional love for us. Grace For Today is locally produced in-house by the Charis Christian Center church staff, and is broadcast to the public on WHT (World Harvest Television) Channel 367. Charis Ministries pays World Harvest Television \$850 per week to air the show over its broadcast facilities.

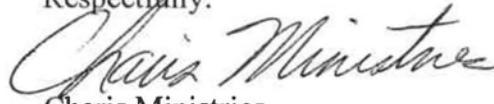
Captioning the program would present an undue burden for several reasons. First, since we do not have the resources to caption the program ourselves, it would have to be sent to an outside source for captioning. Second, the added production cost for captioning would make production of the program unaffordable and the time for captioning would make meeting WHT Channel air-date deadlines nearly impossible. Finally, a captioning requirement would ultimately cause us to either terminate or severely limit production of the program, and cause us to lose viewers and supporters who would no longer be able to regularly view the program. We have discussed with World Harvest Television the possibility of their assisting us in captioning the program at no cost, but they have advised us that they do not have the necessary resources or staffing to perform captioning on our behalf.

Charis Ministries respectfully submits that the basis for its captioning exemption request based on undue burden is practically identical to the facts justifying undue burden exemptions in the Commission's 2006 Memorandum Opinion & Order, *In Re Anglers for*

*Christ Ministries, Inc. & New Beginning Ministries Petitions for Exemption from Closed Captioning Requirements, CGB-CC-0005 and -0007, 21 FCC Rcd 10094 (September 12, 2006).* In light of that precedent, and the facts set forth in this letter, we respectfully request that Charis Ministries (aka: Charis Christian Center) be granted an undue burden exemption from the captioning requirements for Grace For Today.

In support of our request, we provide a copy of certain documents establishing Charis Ministries non-profit status. In addition, as permitted by §1.16 of the Commission's rules, we are providing a Declaration Under Penalty of Perjury in support of the facts set forth in this request for exemption in lieu of the affidavit required by §79.1(f)(9). Should the Commission require additional information, please contact the undersigned individual.

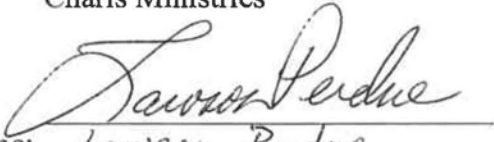
Respectfully:

  
Charis Ministries

By:

Printed Name:

Title:

  
Lawson Perdue  
President

**Declaration Under Penalty of Perjury of Lawson Perdue  
in support of Charis Ministries Request for Undue Burden Exemption  
from Closed Captioning Rules**

I, Lawson Perdue, President of Charis Ministries, do hereby declare under penalty of perjury of the laws of the United States of America that the following statements are true and correct.

1. Charis Ministries (aka: Charis Christian Center) is a donor supported non-profit organization organized under the laws of the state of Colorado.
2. Since 2008, has produced a 30-minute video program called Grace For Today. Grace For Today is a program that presents the message of God's unconditional love for us. Grace For Today is locally produced in-house by the Charis Christian Center staff, and is broadcast to the public on WHT Channel 367. Charis Christian Center pays World Harvest Television \$850 per week to air the show over its broadcast facilities.
3. Charis Ministries has discussed with World Harvest Television the possibility of their assisting in captioning Grace For Today at no cost, but they have advised us that they do not have the necessary resources or staffing to perform captioning on our behalf.
4. Captioning Grace For Today would present an undue burden because we do not have the resources to caption the program ourselves, and it would have to be sent to an outside source for captioning.
5. The added production cost for captioning would make production of the program unaffordable and the time for captioning would make meeting WHT 367 air-date deadlines nearly impossible.
6. A captioning requirement for Grace For Today would ultimately cause Charis Ministries to either terminate or severely limit production of the program, and cause us to lose viewers and supporters who would no longer be able to regularly view the program.

Executed on July 29, 2011.

Celestina D. Graumann  
Signature



My Commission Expires 06-16-13

Lawson Perdue

INTERNAL REVENUE SERVICE  
DISTRICT DIRECTOR  
P. O. BOX 2508  
CINCINNATI, OH 45201

DEPARTMENT OF THE TREASURY

Date:

APR 01 1999

CHARIS MINISTRIES  
C/O LAWSON PERDUE  
11187 COUNTY RD 20.5, BOX 71  
KIT CARSON, CO 80825

Employer Identification Number:  
84-1481733  
DLN:  
17053365009048  
Contact Person:  
D. A. DOWNING ID# 31505  
Contact Telephone Number:  
(877) 829-5500  
Accounting Period Ending:  
December 31  
Foundation Status Classification:  
509(a)(1)  
Advance Ruling Period Begins:  
November 6, 1998  
Advance Ruling Period Ends:  
December 31, 2002  
Addendum Applies:  
No

Dear Applicant:

Based on information you supplied, and assuming your operations will be as stated in your application for recognition of exemption, we have determined you are exempt from federal income tax under section 501(a) of the Internal Revenue Code as an organization described in section 501(c)(3).

Because you are a newly created organization, we are not now making a final determination of your foundation status under section 509(a) of the Code. However, we have determined that you can reasonably expect to be a publicly supported organization described in sections 509(a)(1) and 170(b)(1)(A)(vi).

0-102/99)  
ADD DEPARTMENT OF REVENUE  
3 CO 80261-0013

CERTIFICATE OF EXEMPTION FOR COLORADO STATE SALES/USE TAX ONLY

USE ACCOUNT NUMBER for all references	LIABILITY INFORMATION		ISSUE DATE
98-15116-0000	04 017	N 110101	NOV 27 2001

1908 CONSTELLATION D COLORADO SPRINGS CO

LICENSE IS  
TRANSFERABLE

CHARIS MINISTRIES  
PO BOX 60722  
COLORADO SPRINGS CO 80960

*Fred Fisher*  
Executive Director  
Department of Revenue